



REC'D TN
REGULATORY AUTH.

BellSouth Telecommunications, Inc.
333 Commerce Street, Suite 2101
Nashville, TN 37201-3300

guy.hicks@bellsouth.com

*01 MAR 30 PM 2:00
Guy M. Hicks
General Counsel

March 30, 2001
OFFICE OF THE
EXECUTIVE SECRETARY
052430
Fax 615 214 7406

VIA HAND DELIVERY

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *Docket to Establish Generic Performance Measurements, Benchmarks,
and Enforcement Mechanisms for BellSouth Telecommunications, Inc.*
Docket No. 01-00193

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth's Petition to Intervene.

Very truly yours,

Guy M. Hicks

GMH:ch
Enclosure

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

*In re: Docket to Establish Generic Performance Measurements, Benchmarks,
and Enforcement Mechanisms for BellSouth Telecommunications, Inc.*

Docket No. 01-00193

**PETITION OF BELL SOUTH TELECOMMUNICATIONS, INC.
FOR LEAVE TO INTERVENE**

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to T.C.A. §4-5-310 and T.C.A. §65-2-107, petitions the Tennessee Regulatory Authority (the "Authority") for leave to intervene in the above-captioned proceeding, and in support thereof states as follows:

1. BellSouth, a Georgia Corporation authorized to conduct and conducting a public utility business in the state of Tennessee, is engaged in furnishing exchange telephone service and intrastate (long distance) intraLATA telephone service in the state of Tennessee subject to the jurisdiction of the Authority and pursuant to T.C.A. §65-4-101 and T.C.A. §65-5-201, *et seq.*
2. The Authority recently convened this proceeding to establish a single set of performance measures so that the Authority can ensure consistency in the performance measurements applicable to all CLECs.
3. BellSouth has a direct interest in the performance measurements, benchmarks, and enforcement mechanisms to be addressed in this proceeding.

4. BellSouth's legal interests may be determined in the proceedings and BellSouth's interests will not be adequately represented unless the Authority allows the BellSouth to intervene.

5. Allowing BellSouth to intervene will not impair the interests of justice or the orderly and prompt conduct of these proceedings.

6. BellSouth respectfully requests that it be granted leave to intervene and participate as a party in the above-captioned proceeding.

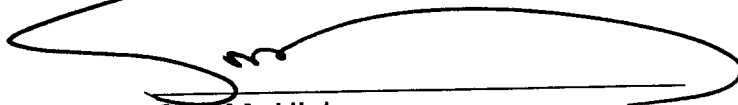
WHEREFORE, BellSouth prays:

1. That it be permitted to intervene in this proceeding and participate as a party.

2. That BellSouth have such other and further relief to which it may be entitled.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

A handwritten signature in black ink, appearing to read "Guy M. Hicks", is written over a horizontal line.

Guy M. Hicks
333 Commerce Street, Suite 2101
Nashville, Tennessee 37201-3300
(615) 214-6301

R. Douglas Lackey
E. Earle Edenfield
J. Philip Carver
675 W. Peachtree Street, Suite 4300
Atlanta, Georgia 30375

CERTIFICATE OF SERVICE


I hereby certify that on March 30, 2001, a copy of the foregoing document was served on the parties of record, via the method indicated:

- ☐ Hand
- ☒ Mail
- ☐ Facsimile
- ☐ Overnight

James Lamoureux, Esquire
AT&T
1200 Peachtree St., NE
Atlanta, GA 30309

- ☐ Hand
- ☒ Mail
- ☐ Facsimile
- ☐ Overnight

Henry Walker, Esquire
Boult, Cummings, et al.
P. O. Box 198062
Nashville, TN 37219-8062





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Guy M. Hicks
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March 30, 2001 OFFICE OF THE
EXECUTIVE SECRETARY

VIA HAND DELIVERY

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *Interconnection Agreement Negotiations Between AT&T
Communications of the South Central States, Inc. TCG MidSouth, Inc.
and BellSouth Telecommunications, Inc. Pursuant to 47 U.S.C. § 252
Docket No. 00-00079*

Dear Mr. Waddell:

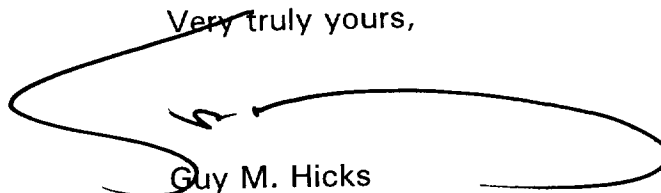
In response to the Notice issued by the Authority on March 9, 2001,
BellSouth proposes the following order of witnesses:

1. John Ruscilli
2. Keith Milner
3. Ron Pate

An updated revised joint issues matrix has been submitted by AT&T.

If you have any questions, please do not hesitate to call.

Very truly yours,



Guy M. Hicks

GMH:ch

cc: Hon. Gary Hotvedt

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